

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION No.: 05-CV-10488-JLA

TIMOTHY HILLS,)	
Plaintiff)	
)	
vs.)	
)	
TOWN OF STOUGHTON, DAVID)	
M. COHEN, INDIVIDUALLY, AND)	
MANUEL CACHOPA, INDIVIDUALLY,)	
Defendants)	
)	

JOINT SCHEDULING STATEMENT PURSUANT TO LR 16.1

NOW COME the parties and submit their Joint Statement, pursuant to LR 16.1, as follows:

1. **DISCOVERY PLAN**

The parties propose the following discovery plan:

- a. Automatic document disclosure to be completed on or about November 14, 2005;
- b. All written discovery shall be served on or before April 28, 2006 and shall be completed by September 29, 2006;
- c. Supplemental written discovery requests shall be served on or before November 30, 2006;
- d. All non-expert depositions to be completed by December 15, 2006;
- e. Plaintiff's expert witnesses shall be designated by September 29, 2006 and Defendant's expert witnesses shall be designated within 30 days after Plaintiff's disclosure;
- f. All expert depositions shall be completed within 30 days of Defendant's expert designation.

2. **MOTION SCHEDULE**

- a. All dispositive motions are to be filed on or before January 19, 2007.

3. **ADR SCHEDULE**

If the parties agree to submit this matter to alternative dispute resolution through the court-sponsored mediation program, they shall schedule mediation for a mutually agreeable time after the completion of discovery.

4. CERTIFICATIONS

The parties will file L.R. 16.1 certifications of conferral on or before the date of the scheduling conference.

Town of Stoughton

By Its Attorneys,

WYNN & WYNN, P.C.

Date: 11/9/05

/s/ Charles D. Mulcahy

Charles D. Mulcahy, Esquire, BBO#359360
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Raynham, MA 02767
(508) 823-4567

Timothy Hills,

By His Attorneys,

COLUCCI, COLUCCI, MARCUS &
FLAVIN, P.C.

Date: 11/9/05

/s/ Dino M. Colucci

Dino M. Colucci, Esquire, BBO#552331
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Milton, MA 02186
(617) 698-6000

CERTIFICATE OF SERVICE

I, Dino M. Colucci, attorney for the Plaintiff, Timothy Hills, in the above-entitled action, hereby certify that on the 9th day of November, 2005, I filed this Joint Scheduling Statement Pursuant to LR 16.1 electronically with the Court, which constitutes service under Local Rules upon the following counsel:

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Wynn & Wynn, P.C.
90 New State Highway
Raynham, MA 02767

/s/ Dino M. Colucci
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